

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF Nos. 2245, 2585, 2652

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.

PROMESA

Title III

No. 17 BK 3283-LTS

**This Notice relates only to the
Commonwealth and shall only be
filed in the lead Case No. 17 BK
3283-LTS**

**NOTICE OF FILING REVISED PROPOSED ORDER RESOLVING MOTION FOR
AN ORDER TO PERMIT THE PROCESSING THROUGH RESOLUTION OF
EMPLOYMENT ARBITRATION AND GRIEVANCE PROCEEDINGS**

PLEASE TAKE NOTICE that on January 16, 2018, the American Federation of State,
County and Municipal Employees International Union, AFL-CIO and the American Federation of

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Teachers, AFL-CIO, on behalf of themselves, their local affiliates in Puerto Rico and their members (collectively, the “Unions”), filed the *Joint Motion of American Federation of State, County and Municipal Employees, AFL-CIO and American Federation of Teachers, AFL-CIO, for an Order to Permit the Processing Through Resolution of Employment Arbitration and Grievance Proceedings* [ECF No. 2245] (the “Motion”), requesting entry of an order allowing prepetition grievances and arbitrations to proceed through the claim and grievance handling process, or, alternatively, lifting the automatic stay as to discharge and disciplinary matters so that urgent matters may proceed in the normal course through resolution.

PLEASE TAKE FURTHER NOTICE that on February 23, 2018, the Commonwealth of Puerto Rico (the “Commonwealth”) filed the *Response of the Commonwealth of Puerto Rico to the CBA Counterparties’ Motion for an Order to Permit the Processing Through Resolution of Employment Arbitration and Grievance Proceedings* [ECF No. 2585] (the “Response”).

PLEASE TAKE FURTHER NOTICE that on March 2, 2018, the Unions filed the *Reply in Further Support of Joint Motion of American Federation of State, County and Municipal Employees, AFL-CIO and American Federation of Teachers, AFL-CIO for an Order to Permit the Processing Through Resolution of Employment Arbitration and Grievance Proceedings* [ECF No. 2652] (the “Reply”).

PLEASE TAKE FURTHER NOTICE that the Commonwealth and the Unions have met and conferred and have successfully resolved the Motion, Response, and Reply pursuant to the terms set forth in the *Stipulation Between the Commonwealth of Puerto Rico and CBA Counterparties Regarding Certain Grievance and Arbitration Procedures* (the “Stipulation”).²

² As of the filing of this Notice, the Service Employees International Union and International Union and the United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) (collectively, the “Non-Moving Parties”) have not agreed to the terms of the Stipulation. Because the Motion was filed only by the Unions and the parties have resolved the relief requested in the Motion pursuant to the Stipulation, the Commonwealth asserts

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit A** is a revised proposed order (the “Revised Proposed Order”), resolving the Motion and approving the Stipulation attached thereto as **Exhibit 1**.

PLEASE TAKE FURTHER NOTICE that copies of the Motion, the Revised Proposed Order, the Stipulation, and all other documents filed in these Title III Cases are available (a) free of charge by visiting <https://cases.primeclerk.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court’s website at <http://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.³

PLEASE TAKE FURTHER NOTICE that the Unions and the Commonwealth respectfully request that the Court consider and enter the attached Revised Proposed Order granting the relief requested therein.

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that the Non-Moving Parties’ (i) *Joinder of Service Employees International Union and International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) to Joint Motion of American Federation of State, County and Municipal Employees, AFL-CIO, and American Federation Of Teachers, AFL-CIO, for an Order to Permit the Processing Through Resolution of Employment Arbitration and Grievance Proceedings* [ECF No. 2249] and (ii) *Reply Memorandum of Service Employees International Union and International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) in Support of Motion for an Order to Permit the Processing Through Resolution of Employment Arbitration and Grievance Proceedings* [ECF No. 2650] are moot and need not be considered at the hearing scheduled for March 7, 2018 at 9:30 a.m. (Atlantic Standard Time).

³ The Financial Oversight and Management Board for Puerto Rico, as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act*, has authorized the Puerto Rico Fiscal Agency and Financial Advisory Authority to file this Notice on behalf of the Commonwealth.

Dated: March 6, 2018
New York, New York

Respectfully submitted,

/s/ Peter Friedman

John Rapisardi
Suzanne Uhland
Peter Friedman
Diana M. Perez
(Admitted *Pro Hac Vice*)
O'MELVENY & MYERS LLP
7 Times Square
New York, NY 10036
Tel: (212) 326-2000
Fax: (212) 326-2061

*Attorneys for the Puerto Rico Fiscal Agency
and Financial Advisory Authority*

/s/ Mohammad S. Yassin

Mohammad S. Yassin
USDC-PR Bar No. 302909
PUERTO RICO FISCAL AGENCY AND
FINANCIAL ADVISORY AUTHORITY
Robert Sánchez Vilella (Minillas)
Government Center
De Diego Avenue, Stop 22
San Juan, Puerto Rico 00907
Tel: (787) 722-2525
Fax: (787) 721-1443

Chief Legal & Regulatory Officer

/s/ José Luis Barrios-Ramos

José Luis Barrios-Ramos, Esq.
McLeary Ave., Suite #303
San Juan, Puerto Rico 00936-8006
Tel.: (787) 593-6641
Barrios.jl@outlook.com

and

/s/ Curtis C. Mechling

Curtis C. Mechling
Sherry J. Millman
Stroock & Stroock & Lavan LLP
180 Maiden Lane, New York, NY 10038
(212) 806-5434
smillman@stroock.com

*For American Federation of Teachers,
AFL-CIO, as authorized agent for the
Asociación de Maestros de Puerto
Rico-Local Sindical*

/s/ Sharon L. Levine

Sharon L. Levine
Dipesh Patel
Saul Ewing LLP
1037 Raymond Blvd.
Suite 1520
Newark, NJ 07102
(973) 286-6713
slevine@saul.com

*For the American Federation of State,
County and Municipal Employees*

Judith Rivlin
Teague P. Paterson
Matthew S. Blumin
American Federation of State, County and
Municipal Employees
1101 17th Street NW, Suite 900

Washington, DC 20011
(202) 775-5900

*For the American Federation of State,
County and Municipal Employees*